

# ECF No. 1

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13 Attorneys for Defendant,  
14 CARDENAS MARKETS, LLC

15  
16 **UNITED STATES DISTRICT COURT**  
17 **DISTRICT OF NEVADA**  
18

19 MARIA QUEZADA, an individual,

20 Plaintiff,

21 vs.

22 CARDENAS MARKETS, LLC, a  
23 Domestic Limited Liability Company;  
24 DOES I-X, inclusive; and ROE  
25 CORPORATIONS I-X, inclusive,  
26 Defendant.  
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Case No.

**DEFENDANT CARDENAS  
MARKETS, LLC NOTICE OF  
REMOVAL OF ACTION TO THE  
UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF  
NEVADA**

28 **TO: THE UNITED STATES DISTRICT COURT FOR DISTRICT OF  
NEVADA:**

PLEASE TAKE NOTICE that DEFENDANT CARDENAS MARKETS, LLC  
hereby removes the state action entitled "MARIA QUEZADA, an individual vs.  
CARDENAS MARKETS LLC, a domestic limited-liability Company; DOES I  
through X; and ROE CORPORATIONS I through X, inclusive," Case No. A-22-  
849356-C filed in the Eighth Judicial District Court for the State of Nevada in and for  
the County of Clark to this Court.

1 The grounds for removal are based on diversity jurisdiction pursuant to 28  
2 USCS § 1332, as follows:

3 1. The residences of all three named parties are diverse:

4 a) Plaintiff resides in Nevada; and,

5 b) Defendant Cardenas Markets, LLC is a Delaware corporation.

6 2. The amount in controversy exceeds \$75,000.00, as Plaintiff has alleged  
7 \$22,407.84 in past medical expenses with \$29,377.00 in alleged future surgical costs.

8 28 US Code § 1332.

9 3. The request is timely submitted as Plaintiff filed their Amended Complaint  
10 on April 14, 2022. Defendant Cardenas Markets, LLC filed their Answer to  
11 the Summons and Complaint on April 22, 2022 and noticed removal within thirty  
12 (30) days of service of the initial pleading on April 26, 2022. 28 U.S. Code § 1446.

13 Dated: April 26, 2022

BREMER WHYTE BROWN & O'MEARA  
LLP

14  
15 By: 

16 Anthony T. Garasi, Esq., Bar No. 11134  
17 Ty M. Maynarich, Esq., Bar No. 14584  
18 Attorneys for Defendant  
19 CARDENAS MARKETS, LLC  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 26<sup>th</sup> day of April 2022, a true and correct copy of the foregoing document was electronically delivered to CM/ECF for filing and service upon all electronic service list recipients.



Camila Alvarez, an employee of BREMER  
WHYTE BROWN & O'MEARA, LLP